

UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
NORFOLK DIVISION

In re:

CHARLES E. HATCH

THERESA A. HATCH

Debtor(s).

Case No. 05-70650-SCS

Chapter 13

LONG BEACH MORTGAGE

c/o WASHINGTON MUTUAL, BANK, FA

Plaintiff,

v.

CMN

CHARLES E. HATCH

THESESA A. HATCH

And

GEORGE W. NEAL, TRUSTEE

Defendant(s).

A N S W E R

COMES NOW the debtor by counsel, and for their answer to the Motion For Relief from Stay filed herein, represents as follows:

1. The allegations contained in paragraphs 1, 3, and 4 are hereby admitted.

2. The allegations contained in paragraphs 2, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, and 16 are neither admitted nor denied and strict proof thereof is demanded.

James L. Pedigo, Jr., Esquire (VSB #30796)

Counsel for the Debtor

HARBOUR LAW, P.L.C.

500 E. Main Street, Suite 1600

Post Office Box 3127

Norfolk, Virginia 23514-3127

E-mail: Pedigo@HarbourLaw.us

(757) 622-1621

WHEREFORE, the debtors pray that the motion for relief be dismissed; that the relief requested be denied; and for such other and further relief as in the premises may seem meet.

CHARLES E. HATCH
THERESA A. HATCH

By /s/ James L. Pedigo, Jr.
Of Counsel

CERTIFICATE OF SERVICE

This is to certify that a true copy of the foregoing Answer was mailed and/or electronically forwarded this 25th day of July, 2006, to Howard N. Bierman, Esquire, 7315 Wisconsin Avenue, Bethesda, MD 20814; George W. Neal, Trustee, 870 Greenbrier Circle, Suite 402, Chesapeake, VA 23320; the debtor at 301 Morton Street, Franklin, VA 23851.

/s/ James L. Pedigo, Jr.
James L. Pedigo, Jr., Esquire

kid